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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TATYANA DREVALEVA,

Plaintiff,

v.

U.S. DEPARTMENT OF VETERANS
AFFAIRS, et al.,

Defendants.

) Case No. 3:18-CV-03748-JCS

) **DEFENDANTS' STATEMENT OF NON-**
) **OPPOSITION TO PLAINTIFF'S MOTION TO**
) **TRANSFER VENUE**

Pursuant to Local Rule 7-3(b), Defendants hereby state that they do not oppose transferring venue of this matter to the District of New Mexico. *See* ECF No. 430. In not opposing the motion to transfer, Defendants do not concede or admit any of the facts, allegations, or arguments in Plaintiff's motion regarding the substance or merits of her claims against Defendants or procedures required. Defendants note that jurisdiction in this district is not proper pursuant to the jurisdiction provisions of Title VII and the Rehabilitation Act. *See* 42 U.S.C. § 2000e-5(f)(3) ("Such an action may be brought in any judicial district in the State in which the unlawful employment practice is alleged to have been committed, in the judicial district in which the employment records relevant to such practice are maintained and administered, or in the judicial district in which the aggrieved person would have worked but for the alleged unlawful employment practice . . ."); 29 U.S.C. § 794a(a)(1).

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1 Date: July 16, 2021

Respectfully submitted,

2 STEPHANIE M. HINDS
Acting United States Attorney

3 /s/Adrienne Zack
4 Adrienne Zack
Assistant United States Attorney